

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

LAURA SANDERS,)		
)		
	Plaintiff,)	
)	
vs.)	No.:
)	
BUNZL DISTRIBUTION MIDCENTRAL,)	
INC.,)	
)	
	Defendant.)	

COMPLAINT

Pursuant to Section 216(b) of the Fair Labor Standards Act (FLSA), Plaintiff files this lawsuit against Defendant and alleges the following:

1. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. Section 1331.
2. Defendant is a Missouri Corporation that does business in Tennessee. Its registered agent for service of process in Tennessee is Corporation Service Company, 2908 Poston Avenue, Nashville, Tennessee 37203.
3. Defendant provides distributions services to clients throughout the United States and internationally.
4. Plaintiff was employed by Defendant as an account specialist from January 3, 2022 until June 1, 2022. Plaintiff worked from her home in Nolensville, Davidson County, Tennessee.
5. Plaintiff's duties included recordkeeping and reporting concerning product pricing and other data associated with one of Defendant's customer accounts. Defendant paid Plaintiff a

salary plus a bonus.

6. Plaintiff routinely worked well over 40 hours per workweek, but was not paid overtime pay at a rate of one and one-half times his regular rate of pay.

7. Instead, Defendant paid Plaintiff the same salary regardless of how many overtime hours she worked each week.

8. Defendant was an "employer" of Plaintiff as defined by Section 203(d) of the FLSA.

9. Plaintiff was an "employee" of Defendant as defined by Section 203(e)(1) of the FLSA.

10. Defendant is an enterprise engaged in commerce or in the production of goods for commerce as defined by Section 203(s)(1) of the FLSA. Defendant has annual gross volume of sales which exceed \$500,000.

11. The minimum wage and overtime provisions of the FLSA set forth in Sections 206 and 207, respectively, apply to Defendant.

12. Pursuant to Section 207(a)(1) of the FLSA, Defendant was required to pay Plaintiff overtime pay at a rate of one and one-half times her regular rate of pay for all hours worked over 40 during a workweek.

13. Defendant's failure to pay Plaintiff overtime wages of one and one-half times her regular rate of pay for all overtime hours worked is a violation of Section 207(a)(1) of the FLSA.

14. Pursuant to Section 216(b) of the FLSA, Defendant is liable to Plaintiff for overtime back pay.

15. In addition to the amount of unpaid overtime wages owing to Plaintiff, Plaintiff is also entitled to recover an equal amount of liquidated damages pursuant to 29 U.S.C. § 216(b).

16. Plaintiff is entitled to an award of attorney's fees and costs pursuant to 29 U.S.C.

§ 216(b).

Prayer for Relief

WHEREFORE, Plaintiff prays for a judgment against Defendant for damages that include the following:

- (a) overtime back pay;
- (b) liquidated damages in an amount equal to her overtime back pay;
- (c) interest;
- (d) reasonable attorney's fees and costs; and
- (e) all other general legal and equitable relief to which she may be entitled.

Respectfully submitted,

/s/ R. Scott Jackson, Jr.
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